



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

May 31, 2019

**BY ECF**

The Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

SDC SDNY
DOCUMENT
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DATE FILED: JUN - 4 2019

Re: *United States v. Abu Ghayth*,  
S14 98 Cr. 1023 (LAK), 19 Civ. 2994 (LAK)

opie~~s~~ mailed JUN - 4 2019  
Chambers of Judge Kaplan

Dear Judge Kaplan:

The Government writes to respectfully request an approximately two-month extension of time within which to file its opposition to defendant-petitioner Sulaiman Abu Ghayth's motion pursuant to 28 U.S.C. § 2255. The Government's opposition is currently due on June 7.

In his motion, Abu Ghayth claims, among other things, that his cleared counsel "never brought any useful evidence" out of the classified discovery. (Mtn. at 3.) To fully respond to that argument, the Government is in the process of locating certain classified materials, including transcripts from classified conferences. As such, the Government respectfully requests until August 9, 2019 to locate those materials, incorporate them into its opposition as appropriate, and file.

**MEMO ENDORSED**

Application granted.

So Ordered: 

Hon. Alison J. Nathan  
U.S.D.J. - Part I  
Dated: June 4, 2019

By:

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

/s/ Michael Ferrara  
Assistant U.S. Attorney  
212-637-2526

Cc: Sulaiman Abu Ghayth